



**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 38

July 9, 2001

Secretary
Pennsylvania Public Utility Commission
Commonwealth Keystone Building
Post Office Box 3265
Harrisburg, Pennsylvania 17105-3265

Dear Secretary:

The accompanying tariff material, issued by Verizon Pennsylvania Inc. (Verizon PA) is sent to you for filing in compliance with the requirements of the Public Utility Code. This filing is made in compliance with the Commission's Opinion and Order adopted on May 24, 2001 and entered June 8, 2001 in Docket Nos. R-00994697 and R-00994697C0001 for collocation issues. These services are existing noncompetitive services. The tariff will become effective on one day's notice on July 10, 2001.

This material consists of the following:

Pa. P.U.C. -No. 218, CLEC Collocated Interconnection Service
Section 2, 2nd Revised Sheets 3 and 4, Original Sheet 4A, 2nd Revised Sheets 5 and 8, 3rd Revised Sheets 9 and 10, 2nd Revised Sheet 10A, 1st Revised Sheet 16, 2nd Revised Sheets 42 and 44

Notice covering the above changes. This material will appear on the Verizon PA web site. The electronic version of this material will be, to the best of my knowledge, an accurate representation of the content of this filing.

If you have any questions about this filing, contact Glenn Kennedy at 717-777-5619.

Sincerely,

Original signed by Ronald F. Weigel

Attachments

Collocation Compliance Filing

This filing is made in compliance with the Commission's Opinion and Order adopted on May 24, 2001 and entered June 8, 2001 in Docket Nos. R-00994697 and R-00994697C0001 for collocation issues. Specifically, this filing revises the intervals for collocation provisioning, adds a statement indicating that the installation interval begins upon receipt of the application fee, reduces the interval start date without a forecast, allows parties to dispute collocation space reclamation via the Alternative Dispute Resolution (ADR) Process and removes the CLEC notification requirement to Verizon PA to access their collocated equipment.

This tariff is being filed July 9, 2001 to become effective on one day's notice on July 10, 2001. These services are existing noncompetitive services. This filing fully complies with the safety, adequacy, reliability and privacy considerations required.

- Pa. P.U.C. -No. 218

VERIZON PENNSYLVANIA INC.

NETWORK INTERCONNECTION SERVICES TARIFF

FOR

ALL PENNSYLVANIA

ISSUED JULY 9, 2001

EFFECTIVE JULY 10, 2001

By Ronald F. Weigel, Director
Strawberry Square, 4th Floor, Harrisburg, Pa.

NOTICE

This tariff is filed in compliance with the Commission's Opinion and Order entered on June 8, 2001 in Docket Nos. R-00994697 and R-00994697C0001 for collocation issues.

Pa. P.U.C. -No. 218, CLEC Collocated Interconnection Service

Section 2, 2nd Revised Sheets 3 and 4, Original Sheet 4A, 2nd Revised Sheets 5 and 8, 3rd Revised Sheets 9 and 10, 2nd Revised Sheet 10A, 1st Revised Sheet 16, 2nd Revised Sheets 42 and 44

VERIZON PENNSYLVANIA INC.

P.U.C.-No. 218
Section 2
2nd Revised Sheet 3
Canceling 1st Revised Sheet 3

CLEC COLLOCATED INTERCONNECTION SERVICE

B. REGULATIONS (Cont'd)

1. General Regulations (Cont'd)

- b. The CLEC must provide the Telephone Company with the appropriate Application Fees, as specified in J. following, along with a completed Collocation Application Form, for each central office Collocated Interconnection arrangement requested. The code installation interval will commence upon receipt of the application fee. (C) |
- c. The Telephone Company will process applications for Collocation on a first-come, first-served basis as determined through the receipt of a completed Collocation Application Form and applicable Application Fee in accordance with the provisions of the Telephone Company Tariff. No work or design and planning will commence until after the CLEC has provided to the Telephone Company the applicable Application Fee, as specified in J. following.
- d. The Telephone Company shall designate all spaces to be occupied by the CLEC's facilities. To the extent practicable and consistent with the needs of the Telephone Company and other CLECs, the Telephone Company will use reasonable efforts to place the Physically Collocated Interconnection space so as to permit the CLEC to expand its Collocated Interconnection space within the same contiguous area unless otherwise specified herein.
- e. Collocation will be provided on a first-come, first-served basis where space and facilities exist. In such instances where two or more requests for space are received at the same time for a central office building with limited space, a lottery will be administered to determine the order of selection of applicants.
- f. In the event that the CLEC withdraws the application prior to completion, the Telephone Company will refund the pre-paid Application Fee, less the reasonable costs incurred. If a CLEC cancels or withdraws its application prior to turn-up, the CLEC is responsible for all costs and liabilities incurred by the Telephone Company in developing, establishing, or otherwise furnishing the Collocation arrangement up to the point of cancellation or withdrawal.
- g. Upon receipt of the CLEC's first Collocation Application Form, the Telephone Company will, upon request, make available to the CLEC at no cost any applicable Telephone Company-specific documentation, as listed in 8. following. The CLEC is responsible for obtaining all other documentation.

ISSUED JULY 9, 2001

EFFECTIVE JULY 10, 2001

In compliance with the order of the Pennsylvania Public Utility Commission of June 8, 2001 in Docket Nos. R-00994697 and R-00994697C00001

VERIZON PENNSYLVANIA INC.

P.U.C.-No. 218

Section 2

2nd Revised Sheet 4

Canceling 1st Revised Sheet 4

CLEC COLLOCATED INTERCONNECTION SERVICE

B. REGULATIONS (Cont'd)

1. General Regulations (Cont'd)

h. Occupancy for all space will be granted upon completion of the design and construction work, as specified in 4. following, including installation of the Telephone Company cabling at the Point of Termination based on the requested cross connects identified by the CLEC in the Application for Collocation. Subject to 2 following, the standard interval to establish a caged Physical Collocation arrangement will be 90 days, unless otherwise specified herein. The standard interval to establish a Virtual Collocation arrangement will be 60 business days. Subject to 2. following, the standard interval to establish an initial Secured Open Collocation Environment (SCOPE) arrangement will be 90 calendar days. The standard interval to establish additional SCOPE arrangements at the same central office location will be 60 calendar days. The interval for Cageless Collocation - Open Environment (CCOE) where the Telephone Company equipment is secure will be 60 calendar days. Where the applicant is requesting CCOE arrangements in an area where the Telephone Company's equipment is unsecured, the interval will be 70 calendar days. The Telephone Company will use reasonable efforts to provide occupancy of the space(s) on the agreed date and will keep the CLEC advised of any delays. The interval clock will stop, and the final due date will be adjusted accordingly, for each day the CLEC delays in providing information to the Telephone Company or otherwise fails to meet its obligations. When the Telephone Company becomes aware of the possibility of vendor delays, it will first contact the CLEC(s) involved to attempt to negotiate a new interval. If the Telephone Company and the CLEC cannot agree, the dispute will be submitted to the Commission Staff. The Telephone Company and the CLEC shall conduct additional joint planning meetings, as reasonably required, to ensure that all known issues are discussed and to address any that may impact the implementation process. The Telephone Company will permit the CLEC to schedule one escorted visit to the CLEC's collocation space during construction. The applicable labor rates in J.C.(1) will be applied for the escorted visits.

(C)

However, if the Telephone Company fails for any reason to provide occupancy of the space(s) to the CLEC within the agreed-to interval for turnover of space(s), the Telephone Company shall not be liable to the CLEC in any way as a result of such failure to provide occupancy, provided that the Telephone Company has used reasonable efforts to provide occupancy within the estimated interval for turnover. In the event that the Telephone Company is delayed in providing occupancy to the CLEC for any reason other than the acts or omissions of the CLEC, the CLEC shall not be obliged to pay the building space and/or conditioning charges for such space(s) until the date that the Telephone Company provides occupancy to the CLEC.

ISSUED JULY 9, 2001

EFFECTIVE JULY 10, 2001

In compliance with the order of the Pennsylvania Public Utility Commission of June 8, 2001 in Docket Nos. R-00994697 and R-00994697C00001

VERIZON PENNSYLVANIA INC.

P.U.C.-No. 218
Section 2
Original Sheet 4A

CLEC COLLOCATED INTERCONNECTION SERVICE

B. REGULATIONS (Cont'd)

i. General Regulations (Cont'd)

The Telephone Company shall have the right to terminate all Collocated Interconnection arrangements at any time with respect to Collocated Interconnection and associated Cable Support Structure(s) and Cable Space(s) where the central office premises becomes the subject of a taking by an eminent authority having such power. The Telephone Company will notify the CLEC in writing as soon as practicable but at least 180 days in advance of such terminations unless the Telephone Company is notified in less than 180 days. The Telephone Company will identify the schedule, as soon as practicable, by which the CLEC must proceed to have the CLEC's equipment or property removed from the Collocated Interconnection and associated Cable Support Structure(s), and Cable Space(s). The Telephone Company will work cooperatively with the CLEC to minimize any potential for service interruption, resulting from their relocation. The CLEC shall have no claim against the Telephone Company for: (1) any relocation expenses (unless the Telephone Company is awarded relocation expense as part of any award made for such taking), (2) any part of any award that may be made for such taking or value of any unexpired initial term or renewal period(s) that results from a termination by the Telephone Company, or (3) any loss of business from full or partial interruption or interference due to any termination. However, nothing herein shall be construed as preventing the CLEC from making its own claim against the eminent authority ordering the taking of the central office premises. (M)

ISSUED JULY 9, 2001

EFFECTIVE JULY 10, 2001

In compliance with the order of the Pennsylvania Public Utility Commission
of June 8, 2001 in Docket Nos. R-00994697 and R-00994697C00001

VERIZON PENNSYLVANIA INC.

P.U.C.-No. 218
Section 2
2nd Revised Sheet 5
Canceling 1st Revised Sheet 5

CLEC COLLOCATED INTERCONNECTION SERVICE

B. REGULATIONS (Cont'd)

1. General Regulations (Cont'd)

- j. The CLEC may terminate Collocated Interconnection arrangements or any portion thereof, Cable Support Structure Space, Cable Space(s) and other arrangements described following by giving ninety (90) days' prior written notice to the Telephone Company. The CLEC is responsible for all costs incurred.
- k. Collocated Interconnection arrangements will automatically terminate if the central office in which the space is located is closed, decommissioned or sold and is no longer used as a Telephone Company central office. At least one hundred and eighty (180) days written notice will be given to the CLEC of events which may lead to the automatic termination of any such arrangement pursuant to this tariff, except when extraordinary circumstances require a shorter interval. In such cases, the Telephone Company will provide notice to the CLEC as soon as practicable. The Telephone Company will work with the CLEC to identify alternate Collocated Interconnection arrangements. The Telephone Company will work cooperatively with the CLEC to minimize any potential for service interruption resulting from such actions.
- l. The Telephone Company will permit interconnection between CLECs providing a dedicated electrical or optical path between Collocation arrangements of the same or of two different CLECs in the same Telephone Company central office location, using Telephone Company provided cross connects. In such an arrangement, CLEC "A" is required to provide cable assignment information for itself and for CLEC "B", and both cross connects must be at the same transmission level. A Service Connection Charge, as set forth in J. following, will apply per request. CLEC collocated equipment must be used for interconnection with the Telephone Company or access to Telephone Company unbundled network elements.

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EFFECTIVE JULY 10, 2001

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VERIZON PENNSYLVANIA INC.

P.U.C.-No. 218

Section 2

2nd Revised Sheet 8

Canceling 1st Revised Sheet 8

CLEC COLLOCATED INTERCONNECTION SERVICE

B. REGULATIONS (Cont'd)

2. Forecasting Data (Cont'd)

Forecast Requests (Cont'd)

- b. Unforecasted demand will be given a lesser priority than forecasted demand. If a CLEC fails to submit a timely forecast, the Telephone Company will attempt to meet the standard interval. If, however, the Telephone Company or its vendors are unable to meet the standard interval due to demand, the Telephone Company will notify the CLEC promptly of the extended interval due date.

(C)

<u>Forecast Received</u>	<u>Interval Start Date Commences</u>	
No forecast	2 months after application date	(C)
Forecast received 1 month prior to application date	2 months after application date	
Forecast received 2 months prior to application date	1 month after application date	
Forecast received 3 months prior to application date	On the application date	

★

★

★

(C)

If the Telephone Company has a written guarantee of reimbursement, it will examine forecasts for offices in which it is necessary to condition space, and discuss these forecasts with CLECs to determine the required space to be conditioned.

If the Telephone Company commits to condition space based on forecasts, CLECs assigned space will give the Telephone Company a non-refundable deposit equal to the application fee.

c. Collocation Capacity

Telephone Company Capacity

The Telephone Company's estimate of its present capacity to fulfill available interconnection collocation requests (i.e., no more than an increase of fifteen percent (15%) over the average number of applications received for the preceding three months in a particular geographic area) is based on current staffing and current vendor arrangements. If the forecasts indicate spikes in demand, the Telephone Company will attempt to smooth the demand via negotiations with the forecasting CLECs. If the Telephone Company and the CLEC fail to agree to smooth demand, the Telephone Company will determine if additional expenditures would be required to satisfy the spikes in demand and will work with the Commission Staff to determine whether such additional expenditure is warranted and to evaluate cost recovery options.

(C)

If the Telephone Company augments its workforce based on forecasts, the CLECs will be held accountable for the accuracy of their forecasts.

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EFFECTIVE JULY 10, 2001

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VERIZON PENNSYLVANIA INC.

P.U.C.-No. 218

Section 2

3rd Revised Sheet 9

Canceling 2nd Revised Sheet 9

CLEC COLLOCATED INTERCONNECTION SERVICE

B. REGULATIONS (Cont'd)

3. Application/Site Survey

- a. The CLEC must request collocation arrangements through its Telephone Company point of contact. Completed applications for collocation must be sent directly to the Telephone Company Collocation project manager at the following address:

Collocation Project Manager Fax: (617) 342-8515
 Verizon Email: collocation.applications@verizon.com
 125 High Street, Room 1134
 Boston, MA 02110

b. Verification of Space Limitations¹

- (1) Subject to B.2. preceding, within ten (10) calendar days after receipt of an application, the Telephone Company will inform the CLEC whether space is available to accommodate the CLEC's request. If the application is deficient, the Telephone Company will specify in writing, within eight (8) business days, the information that must be provided by the CLEC in order to complete the application. Any CLEC that resubmits a revised application curing any deficiencies in their original application, within ten (10) calendar days after being informed of them, shall retain its position with the collocation application queue. The response will be one of the following: (C)
- a) There is space and the Telephone Company will proceed with the arrangement.
 - b) There is no space to accommodate the request. The Telephone Company will proceed as described in 2. following. The Telephone Company will notify the CLEC if space is available to accommodate a smaller collocation arrangement.
 - c) There is no readily available space, however, the Telephone Company will determine whether space can be made available and will notify the CLEC within 20 business days. At the end of this period, the Telephone Company will proceed as described in a) or b) above.
- (2) When the Telephone Company determines sufficient space is not available to accommodate a Physical Collocation request at a Telephone Company central office, the Telephone Company will, within an additional ten (10) business days of denying a request, unless otherwise agreed to by the requesting CLEC, allow all interested CLECs to tour the Telephone Company central office. In all instances, the Telephone Company will provide reasonable notice to all CLECs and the Telephone Company and interested CLECs will make a good faith effort to coordinate tours of the affected Telephone Company premises. Such tours will not be restricted to the room in which space was denied but will include the entire premises. If interested CLECs do not accompany the requesting CLEC on the tour, no further tours will be provided.

¹ Interim Verification of Space Limitation per the "Global Order" Docket M-00981185, P-00991648 and P-00991649.

ISSUED JULY 9, 2001

EFFECTIVE JULY 10, 2001

In compliance with the order of the Pennsylvania Public Utility Commission
 of June 8, 2001 in Docket Nos. R-00994697 and R-00994697C00001

VERIZON PENNSYLVANIA INC.

P.U.C.-No. 218
Section 2
3rd Revised Sheet 10
Canceling 2nd Revised Sheet 10

CLEC COLLOCATED INTERCONNECTION SERVICE

B. REGULATIONS (Cont'd)

3. Application/Site Survey (Cont'd)

b. Verification of Space Limitations¹ (Cont'd)

(2) (Cont'd)

In addition, on or before the date of the tour, the Telephone Company will provide the Commission Staff and requesting CLECs with access to floor plans, which indicate, inter alia, future use information, etc.

For any case in which Physical Collocation space has been denied by the Telephone Company, the CLEC may file a Petition for Dispute Resolution with the PUC to review the Telephone Company's denial. Within twenty-five (25) days after service of the Petition for Dispute Resolution, the Telephone Company must file a report with the Commission that includes information on the use of floor space by the Telephone Company and its affiliates, the amount of space used by collocators, the amount of space used by third parties for purposes other than collocation, a description of plans for office renovation or expansion and a description of plans for the conversion of space to collocation space.

The Telephone Company will file its Exemption Petition no later than forty-five (45) calendar days after a CLEC request for space has been denied.

(C)

- (3) No sooner than twelve (12) months after the Commission deems a premises exempt, upon written request from a CLEC that has a good faith interest in that particular premises, the Telephone Company will respond within ten (10) business days in writing as to whether physical collocation space is still unavailable at the exempt premises. The CLECs may tour the premises within ten (10) business days after this notice. The Telephone Company will update the floor plan, if requested, prior to providing a tour to the CLECs. If a CLEC informs the Telephone Company in writing that it disagrees with its position regarding space unavailability, the Telephone Company will file a petition to renew its exemption with the Commission within thirty (30) business days of the CLEC's notice. The Telephone Company will have the burden of proof to demonstrate that space is still unavailable at the exempt premises. The Telephone Company shall provide to all interested parties copies of the original exemption petition (excluding floor plans), and shall file updated information indicating any changed circumstances since the premises was deemed exempt.

¹ Interim Verification of Space Limitation per the "Global Order" Docket M-00981185, P-00991648 and P-00991649.

ISSUED JULY 9, 2001

EFFECTIVE JULY 10, 2001

In compliance with the order of the Pennsylvania Public Utility Commission of June 8, 2001 in Docket Nos. R-00994697 and R-00994697C00001

VERIZON PENNSYLVANIA INC.

P.U.C.-No. 218
Section 2
2nd Revised Sheet 10A
Canceling 1st Revised Sheet 10A

CLEC COLLOCATED INTERCONNECTION SERVICE

B. REGULATIONS (Cont'd)

3. Application/Site Survey (Cont'd)

b. Verification of Space Limitations¹ (Cont'd)

- (4) If a Telephone Company premises has been deemed exempt from the physical collocation requirements of the Telecommunications Act of 1996, the Telephone Company will provide interested CLECS, upon request and issuance of reasonable notice, a tour of the premises in conjunction with the exemption renewal process described above. Multiple tours will not be provided. The Telephone Company is not obligated to provide a tour to any CLEC after a premises has been deemed exempt by the Commission, unless it is part of this exemption renewal process described above. The Telephone Company shall notify the Commission of any material changes that may make space available at an exempt premises within thirty (30) business days of a determination that a change is likely to occur Staff request. (M)
- (5) The Telephone Company will provide an escort who will be able to answer questions regarding present and future use of space, and will provide construction plans for empty space upon Commission

- c. The Telephone Company will post a list on its Web site of all central offices that have no space for collocation and will update the list within ten (10) calendar days of the date at which a central office runs out of physical collocation space.

The interval for turnover of space will run from the date of payment by the CLEC of the first installment of the Space and Facility Charge as defined in B.4. and will be contingent upon receipt of all applicable required permits. If the Telephone Company does not receive the first installment of the Space and Facility Charge within 30 days, the Telephone Company will consider the offer rejected and will cancel the application and make the available space allocated for that application available to meet additional CLEC requests. The Telephone Company will refund the pre-paid application fee less the reasonable costs incurred.

¹ Interim Verification of Space Limitation per the "Global Order" Docket M-00981185, P-00991648 and P-00991649.

ISSUED JULY 9, 2001

EFFECTIVE JULY 10, 2001

In compliance with the order of the Pennsylvania Public Utility Commission of June 8, 2001 in Docket Nos. R-00994697 and R-00994697C00001

VERIZON PENNSYLVANIA INC.

P.U.C.-No. 218
Section 2
1st Revised Sheet 16
Canceling Original Sheet 16

CLEC COLLOCATED INTERCONNECTION SERVICE

B. REGULATIONS (Cont'd)

7. Use of Space

- a. "Efficiently used" shall mean that substantially all of the floor space is taken up by the equipment permitted in the Telephone Company tariffs. Such equipment must be placed no greater than 20% above the minimum distribution permitted by Telecordia Technologies™ Network Engineering Building System (NEBS) Generic Equipment Requirements (GR-63-CORE).

If the Collocated Interconnection space is not secured in a metal enclosure (cage), the equipment frame placement must adhere to minimum aisle spacing standards for that system between the equipment frame placement and the perimeter of the Collocated Interconnection space as defined in the most recent issue of Telecordia Technologies Network Equipment Building System (NEBS) requirements (GR-63-CORE).

The Telephone Company will work cooperatively with the CLEC to accommodate as many collocation arrangements as possible at central offices where there is limited physical space available.

- b. If Collocated Interconnection Space is needed to accommodate another CLEC or the Telephone Company's service, the Telephone Company may take back from the CLEC any Collocated Interconnection Space that is not being "efficiently used." In addition, the Telephone Company may take back for the same purposes space not being used at all to house equipment specified in the Telephone Company tariffs for Collocated Interconnection. The CLEC will have one hundred and eighty (180) days from the time of notice by the Telephone Company to the CLEC of the need for such space to ensure that such space is being used in accordance with the terms herein. Impacted parties to disputes involving collocation space reclamation may seek, if necessary, an expedited remedy via the Commission's Alternative Dispute Resolution (ADR) Process.

(C)

ISSUED JULY 9, 2001

EFFECTIVE JULY 10, 2001

In compliance with the order of the Pennsylvania Public Utility Commission
of June 8, 2001 in Docket Nos. R-00994697 and R-00994697C00001

VERIZON PENNSYLVANIA INC.

P.U.C.-No. 218
Section 2
2nd Revised Sheet 42
Canceling 1st Revised Sheet 42

CLEC COLLOCATED INTERCONNECTION SERVICE

F. Cageless Collocation - Open Environment (CCOE) (Cont'd)

4. Site Survey Report, Application, Engineering and Implementation

- a. The Telephone Company will make available to the CLEC, upon signing a confidentiality agreement, a Site Survey/Report, as described in B.3. preceding.
- b. The CLEC must request CCOE arrangements through its Telephone Company Point of Contact, subject to the terms and conditions as described in B.3. preceding.
- c. The interval for CCOE where the Telephone Company equipment is secure will be 60 calendar days. Where the applicant is requesting CCOE arrangements in an area where the Telephone Company's equipment is unsecured, the interval will be 70 calendar days. (C)

5. Point of Termination (POT)

- a. The POT is the connection point between the collocated equipment and the Telephone Company network. The CLEC must select from one of the following options:
 - (1) The Telephone Company will provide a Shared Point of Termination (SPOT) Bay for CCOE arrangements in a common area. All CLECs purchasing CCOE will have access to the SPOT Bay.
 - (2) The CLEC may provide their own POT bay and provide the demarcation point within the CLEC-provided equipment bay as designated by the Telephone Company.

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VERIZON PENNSYLVANIA INC.

P.U.C.-No. 218
Section 2
2nd Revised Sheet 44
Canceling 1st Revised Sheet 44

CLEC COLLOCATED INTERCONNECTION SERVICE

F. Cageless Collocation - Open Environment (CCOE) (Cont'd)

7. Security Measures

- a. The Telephone Company will determine the appropriate level of security in each central office.
- b. The CLEC agrees to abide by all Telephone Company security practices for CLEC employees/agents with access to the Telephone Company's central offices, as described in Verizon's Security Guidelines, which will be provided upon request.
- c. The CLEC will be required to sign a confidentiality agreement prior to being permitted to enter the Telephone Company central office.
- d. The Telephone Company reserves the right to provide a Telephone Company employee to accompany and observe the CLEC employee at the CLEC's requested time of entry to the central office, at no cost to the CLEC.
- e. CLECs will have access to their collocated equipment twenty-four (24) hours a day, seven (7) days a week, without a security escort. (C)
- f. The CLEC will supply the Telephone Company with a list of its employees or approved vendors who require access. The list will include social security numbers of all such individuals or an alternative form of identification as specified by the Telephone Company. All individuals must be U.S. citizens where required by law or regulation.
- g. The Telephone Company will provide the CLEC with non-employee identification badge applications. The CLEC will provide the Telephone Company with completed applications and two passport-sized photos for each CLEC employee who requires access. The CLEC employee/vendor(s) must prominently display valid identification badges at all times while on Telephone Company property. This badge will permit direct access to the location of the CLEC's CCOE arrangement in the central office. The Telephone Company will also issue access cards to each listed employee/vendor where access card systems are installed. All badges/access cards must be returned upon termination of this arrangement. The CLEC is responsible for notifying the Telephone Company of any lost or stolen identification badges or access cards, and is responsible for returning the badges/access cards issued to employees that are no longer employed or engaged by the CLEC.

ISSUED JULY 9, 2001

EFFECTIVE JULY 10, 2001

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**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 39

REDACTED – FOR PUBLIC INSPECTION

Pennsylvania
Provisioning - Average Int. Completed - IOF (PR-2-09)
(Orders w/ Initial Offered Interval of Standard 15-Days (or less))
February 2001 - June 2001
Analysis

CLEC Aggregate PR-2-09
Reported Performance
Observations

Feb-01 Mar-01 Apr-01 May-01 Jun-01 Feb - Jun

34.00	12.79	17.35	20.29	11.44	18.25
7	14	17	21	9	68.00

Analysis of Completed Orders With Initial Offered Interval of Standard 15 Days (or Less)

Total Orders With Initial Offered Interval of Standard 15 Days or Less

11	4	19	16	33	83
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Orders With Customer Delays or Facility Problems

3	2	7	2	20	34
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Orders Without Customer Delays or Facility Problems

8	2	12	14	13	49
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Average Completed Interval For Orders Without Customer Delays
or Facility Problems

12.9	11	12.2	15.6	10.7	12.84
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REDACTED – FOR PUBLIC INSPECTION



**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 40

REDACTED – FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION



**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 41

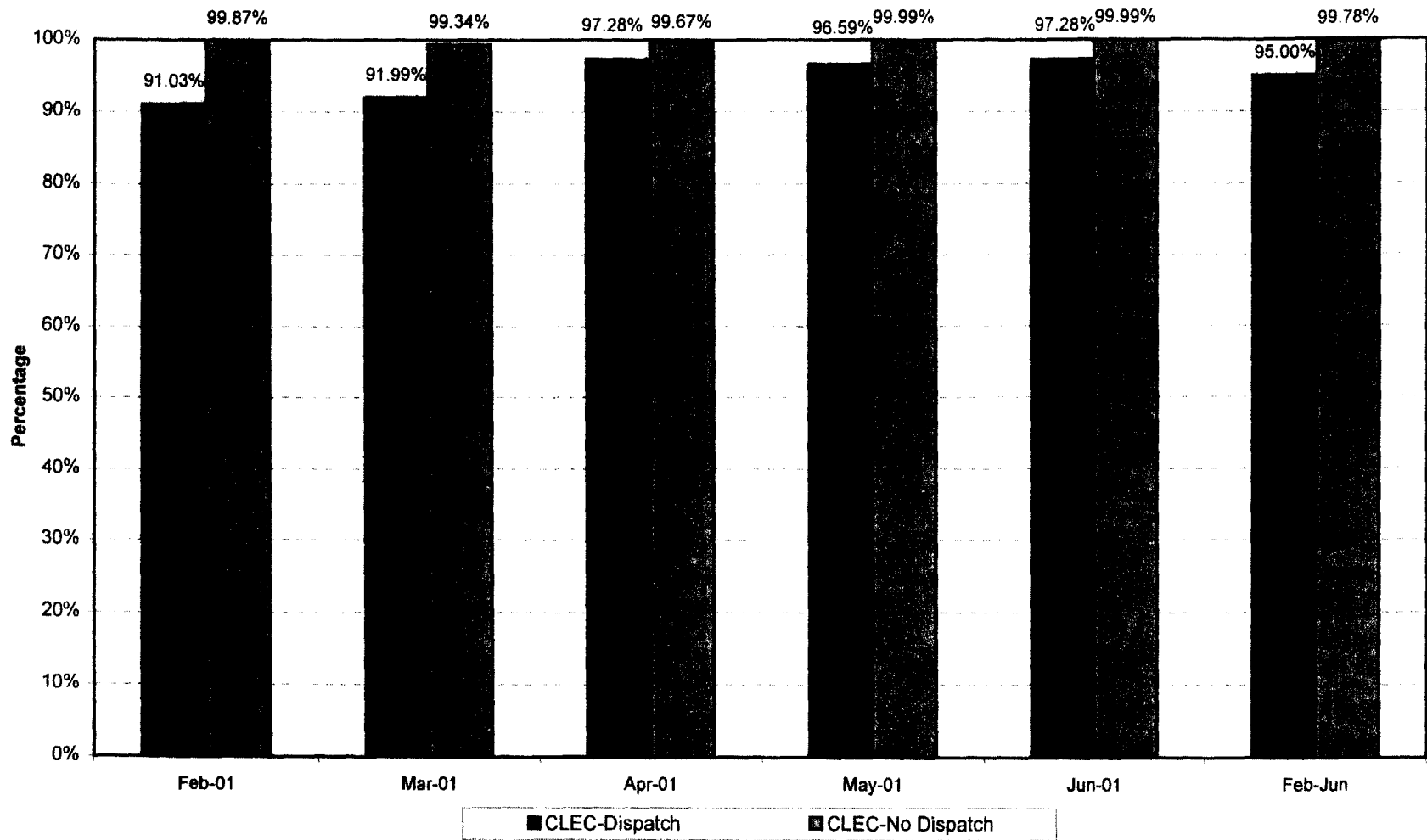
REDACTED – FOR PUBLIC INSPECTION

REDACTED – FOR PUBLIC INSPECTION

**REPLY DECLARATION OF PAUL A. LACOUTURE AND
VIRGINIA P. RUESTERHOLZ**

ATTACHMENT 42

**Pennsylvania - POTS Platform
Provisioning - % Appointments Met - Verizon - Dispatch and No Dispatch - Platform
(Inverse of PR-4-04 and PR-4-05)
Feb - Jun 01**



Pennsylvania - POTS Platform
Provisioning - % Missed Appointments - Verizon - Dispatch and No Dispatch
PR-4-04 and PR-4-05
Feb - Jun 01

Percent Missed Appt. - Verizon - Dispatch - Platform
(PR-4-04)

Verizon
Performance
Observations
CLEC
Performance
Observations

Feb-01 Mar-01 Apr-01 May-01 Jun-01 Feb-Jun

8.26%	7.44%	6.82%	6.37%	6.99%	7.18%
33699	38709	33468	33110	35837	174823

8.97%	8.01%	2.72%	3.41%	2.72%	5.00%
669	886	881	881	845	4162

Percent Missed Appt. - Verizon - No Dispatch - Platform
(PR-4-05)

Verizon
Performance
Observations
CLEC
Performance
Observations

0.27%	0.40%	0.11%	0.06%	0.08%	0.19%
411871	473032	405215	407386	420918	2118422

0.13%	0.66%	0.33%	0.01%	0.01%	0.22%
51724	58404	56504	59298	64481	290411

% Appt. Made = Inverse of PR-4-04 and PR-4-05

Dispatch (PR-4-04)

VZ	91.74%	92.56%	93.18%	93.63%	93.01%	92.82%
CLEC	91.03%	91.99%	97.28%	96.59%	97.28%	95.00%

No Dispatch (PR-4-05)

VZ	99.73%	99.60%	99.89%	99.94%	99.92%	99.81%
CLEC	99.87%	99.34%	99.67%	99.99%	99.99%	99.78%

Combined (PR-4-04 and 4-05)

	99.13%	99.07%	99.38%	99.47%	99.38%	99.28%
	99.76%	99.23%	99.63%	99.94%	99.95%	99.71%